

# **EXHIBIT D**

# EXHIBIT 3

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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH**

<b>Crystal Lagoons U.S. Corp.,</b>  Plaintiff,  v.  <b>Cloward H2O LLC,</b>  Defendant.	Civil No. 2:19-cv-00796-BSJ  <b>Declaration of Cory M. Severson in Support of Cloward H2O LLC's Motion for Partial Summary Judgment of Non-Infringement of the '514 Patent</b>  District Judge Bruce S. Jenkins
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I, Cory M. Severson, hereby declare and state as follows:

1. I am the President of Pacific Aquascape International.
2. I am over the age of twenty-one years and make this declaration based on my own first-hand knowledge, and through the use of documents kept by Pacific Aquascape International in its ordinary course of business to which I have access during my normal employment. If called to testify to any of the facts or perceptions set forth herein, I could and would competently do so.
3. My testimony below relates to the swimming lake ("Swimming Lake") at the Hard Rock Seminole Hotel and Casino in Hollywood, Florida.
4. Pacific Aquascape International constructed the Swimming Lake in accordance with the plans for the Swimming Lake provided by Cloward H2O LLC.
5. The Swimming Lake employs a filtration system that filters the entire volume of water multiple times per day through the use of wall inlets, floor inlets, bottom drains, and skimmers to take water from the lake and then return it after it is filtered and chemically treated in two mechanical rooms on each side of the Swimming Lake.
6. These mechanical rooms each filter the water of the Swimming Lake at the flow rate of 3,200 gallons per minute (gpm) for a combined rate of 6,400 gpm, and it takes 10.57 hours (634 minutes) to filter and disinfect the entire volume of 4,059,015 of gallons.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this Declaration was executed on the 14th day of April 2020, at Huntington Beach, CA.

By:

  
Cory M. Severson